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IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CR. NO. S-04-177 MCE
)	
Plaintiff,)	
)	STIPULATION; ORDER
MARIO NOEL PEREZ,)	
)	
Defendant.)	
_____)	

Defendant Mario Noel Perez, through Colin L. Cooper, Attorney At Law, and the United States of America, through Assistant U.S. Attorney Kenneth J. Melikian, agree to vacate the status conference scheduled for June 14, 2005. The parties further stipulate that a status conference be placed on the court's August 30, 2005, calendar.

The reason for the requested continuance is that defense counsel is currently engaged in a murder trial which is expected to last up to two more weeks. After that trial is concluded, he is scheduled to immediately start another trial. When that trial concludes, both parties have various conflicts which make August 30th the first date that both counsel are available.

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Additionally, the parties are continuing plea negotiations which they are confident will result in a resolution of this case.

Accordingly, the parties request that the status conference in this case be continued to August 30, 2005. The parties further agree that time should be excluded through August 30, 2005, from computation under the Speedy Trial Act pursuant to local code T4 (18 U.S.C. § 3161(h)(8)(B)(iv)) to allow the defendant a reasonable amount of time to prepare his case.

DATED: June 10, 2005

Respectfully submitted,

McGREGOR W. SCOTT
United States Attorney

/s/ Kenneth J. Melikian


By
KENNETH J. MELIKIAN
Assistant U.S. Attorney

DATED: June 10, 2005

/s/ Colin L. Cooper
COLIN L. COOPER
Attorney for Defendant Perez
(Signed by Kenneth J. Melikian
per telephonic authorization by
Colin L. Cooper)

IT IS SO ORDERED.

DATED: June 13, 2005


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE